

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF FLORIDA  
ORLANDO DIVISION

In re:

Case No.: 18-00458  
Chapter 7

ALFREDO HERRERA  
MARIELA HERRERA

DEBTOR

**APPLICATION FOR COMPENSATION FOR REALTOR**

**NOTICE OF OPPORTUNITY TO OBJECT AND REQUEST FOR HEARING**

Pursuant to Local Rule 2002-4, the Court will consider the relief requested in this paper without further notice or hearing unless a party in interest files a response within (21) twenty-one days from the date set forth on the attached proof of service, plus an additional three days for service if any party was served by U.S. Mail. If you object to the relief requested in this paper, you must file a response with the Clerk of the Court at 400 W. Washington St., Suite 5100, Orlando, Florida 32801 and serve a copy on Arvind Mahendru, Trustee, 5703 Red Bug Lake Road #284, Winter Springs, Florida 32708 and any other appropriate persons within the time allowed.

If you file and serve a response within the time permitted, the Court will either schedule and notify you of a hearing, or consider the response and grant or deny the relief requested without a hearing. If you do not file a response within the time permitted, the Court will consider that you do not oppose the relief requested in the paper, will proceed to consider the paper without further notice or hearing, and may grant the relief requested.

Arvind Mahendru, Trustee, by and through his undersigned counsel files this Application for Compensation for Realtor, BK Global Real Estate Services and Century 21 Carioti (the Realtor), in the above-captioned case and in support thereof states:

1. The Court has approved the employment of the Realtor, in this case (Doc. No. 17).
2. The Realtor assisted the Trustee in negotiating a deed-in-lieu transaction whereby the secured creditor compensated the estate in the amount of \$15,000.00 in exchange for receiving the deed to real property located at 4136 Crossen Dr, Orlando, Florida ("the Property").
3. The Realtor, BK Global Real Estate Services, seeks fees in the amount of \$4,500.00 for

services provided to the Estate. Pursuant to our agreement, the Realtor would have received 2% of the sales price or \$2,600.00 for negotiating the short sale approval with the lender.

Due to structural problems, the property could not be sold and Realtor successfully obtained approval from the lender to sell the property in a deed in lieu transaction. The Realtor seeks an additional compensation of \$1,900.00 for its efforts in obtaining deed in lieu transaction approval and a combined compensation of \$4,500.00.

4. The Realtor, Century 21 Carioti, seeks fees in the amount of \$1,500.00 for services provided to the Estate. Pursuant to our agreement, the Realtor would have received 2% of the sales price or \$2,600.00 if the sale of the property had completed.
5. The Trustee believes that the Realtor provided a valuable service to the Estate and should be afforded the compensation described above.

**WHEREFORE**, the Trustee respectfully requests that the Court award fees to Century 21 Carioti in the amount of \$1,500.00 and BK Global Real Estate Services in the amount of \$4,500.00 for services rendered in this case and for any other relief as the Court deems just.

Respectfully submitted,

/s/ Arvind Mahendru  
Arvind Mahendru, Esq.  
5703 Red Bug Lake Rd. #284  
Winter Springs, FL 32708  
407-504-2462

#### **CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the Application for Compensation for Realtor was served by electronic delivery to the Office of the United States Trustee on April 15, 2019.

Alfredo A Herrera, Mariela E Herrera, 3950 RUNNING WATER DRIVE, ORLANDO, FL 32829;

Walter F Benenati, Walter F Benenati, Credit Attorney PA, 2702 E. Robinson Street, Orlando, FL 32803

United States Trustee, [ustp.region21.ecf@usdoj.gov](mailto:ustp.region21.ecf@usdoj.gov)

/s/ Arvind Mahendru  
Arvind Mahendru